

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XIAOBING WANG AND LIANGQING
LI,

Plaintiff,

v.

INDIVIDUALS, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
ON SCHDULE “A”,

Defendants.

Case No. 22 cv 2024

District Judge Thomas M. Durkin
Magistrate Judge Sheila M. Finnegan

**PLAINTIFFS’ MEMORANDUM RESPONSE TO THE
COURT’S RULE TO SHOW CAUSE**

Plaintiffs, Xiaobing Wang and Liangqing Li (“Plaintiffs”), by and through their attorneys, Barney & Karamanis, LLP, submits the following memorandum in response to the Court’s Rule to Show Cause regarding dismissal as a sanction:

INTRODUCTION

On February 22, 2023, this Court issued a minute order directing Plaintiffs to show cause why their claims should not be dismissed for reasons addressed in hearings held on February 10, 2023 and February 17, 2023. At the outset, Plaintiffs’ counsel apologizes to the Court for the mistakes identified in the record and at hearings, and assures the Court that any mistakes made were inadvertences and/or omissions due to trial schedules, competing deadlines, and a death in Plaintiffs’ counsel Nazarian’s family, and not because of any direct attempt to mislead the Court. In addressing the Court’s enumerated concerns in its February 22, 2023 Order, Plaintiffs’ counsel provides the following explanations. In spite of these errors, Plaintiffs assert that

sanctions should not be imposed because Plaintiffs' claims are meritorious and Defendants had actual knowledge of the pending case.

ARGUMENT

1. Submitting the TRO and preliminary injunction orders with inadvertent errors regarding trademarks instead of patents:

On April 18, 2022, Plaintiffs filed their Original Complaint (Dkt. No. 1) and their Amended Complaint (Dkt. No. 4). On April 18, 2022, Plaintiffs filed its *Ex Parte* Motion for Entry of a Temporary Restraining Order (Dkt. No. 3) and Motion for Alternative Service (Dkt. No. 2). On April 20, 2022, this Court granted Plaintiffs' Motion for Alternative Service and Sealed Temporary Restraining Order (Dkt. No. 6). The Temporary Restraining Order issued by the Court properly identified that Plaintiffs were seeking claims for "Patent Infringement" against Defendants. (Dkt. No. 8). That order identified the patent registration number and the name of the patent. There are a total of three instances where the word "trademarks" was inadvertently not changed to patents. This was not meant with any intent to deceive the Court, but was an honest mistake and a scriveners error.

Similarly, on August 4, 2022, Plaintiff's counsel Nazarian provided edits to the Court's proposed preliminary injunction order, however, the order was inadvertently submitted without changing "trademarks" to "patents." *See*, Declaration of Kenneth Nazarian attached hereto as Exhibit A. During this period of time, Plaintiff's counsel had just finished a trial (7/5/22 -7/21/22), which was followed immediately by the drafting of a response to a motion for summary judgment due July 29, 2022, and an oral argument before the Illinois Second District Appellate Court on August 3, 2022. *See*, Exhibit A. As a result, Plaintiffs' counsel was distracted and rushing to get the order to the Court. This caused him to make the aforementioned errors. Again, these mistakes

were not made with any intent to deceive the Court. These errors were not realized by Plaintiffs' counsels until the hearing on February 10, 2023.

Though the entry of the TRO and preliminary injunction orders with trademark language were in error, the basis for the TRO and preliminary injunction were sound. Plaintiffs are the owner of federally registered patent, registration number 8,294,542 B2 ("542 Patent"), for Magnetic Suspension Device, with all rights to enforce. The registration is valid, subsisting, and in full force and effect. *See Amended Complaint at ¶ 7 (Dkt. No. 4).* Defendants are individuals and entities who sell and/or offer to sell infringing products through various "storefronts" via online retail websites. *See Amended Complaint at ¶ 2.* Each Defendant sells and/or offers to sell infringing products through various "storefronts" via online retail websites accepting US Dollars through Amazon.com, eBay.com, wish.com, and Walmart website platforms through which each Defendant targets residents in this judicial district. Defendants directly or through intermediaries offer to sell and/or sell magnetic suspension lamps which infringe the '542 patent. *See Id. at ¶ 10.* Each Defendant has been and is now infringing claims 1, 2, 3, and 8 of the '542 patent in the State of Illinois, in this judicial district, and other jurisdictions in the United States by selling or offering to sell the infringing magnetic suspension devices. The Defendants are directly infringing, literally infringing, and/or otherwise infringing the '542 Patent under the doctrine of equivalents. *See Id. at ¶ 11.*

The infringing products directly infringe claim 1 of the '542 patent. As stated in Plaintiffs' arguments for the entry of the temporary restraining order, the infringing products are magnetic suspension devices that include a magnetic base and a suspension body; the suspension body being suspended above the magnetic base, the suspension body being provided with a receiving coil and at least one luminous body; the magnetic base being provided with a transmitting coil, the transmitting coil transmitting an AC signal to the receiving coil; the receiving coil converting the

AC signal transmitted by the transmitting coil into electric energy and supplying the electric energy to the luminous body for emitting light, wherein the suspension body is provided with a plurality of luminous bodies; the luminous bodies adopt LED lamps which are arranged inside the suspension body or on the suspension body, and are connected with the receiving coil by electric connection, wherein a permanent magnet is arranged inside the suspension body, and the permanent magnet is arranged symmetrically around the barycenter vertical of the suspension body, wherein the suspension body comprises an upper case, a lower case and a mounting ring arranged between the upper case and the lower case; a mounting part is arranged at the middle of the mounting ring, and the luminous bodies are mounted to the mounting part and are connected to the receiving coil via a connecting wire; the permanent magnet is an assembly of magnets, of which the lower end is a cylindrical magnet, and the upper end is several overlapped circular magnets; the middle of the receiving coil is provided with a through hole corresponding to the cylindrical magnet of the permanent magnet; the lower case is provided with a fixing pillar corresponding to the cylindrical magnet, and the middle of the fixing pillar is provided with a fixing hole; the cylindrical magnet passes through the through hole of the receiving coil, and then is inserted into the fixing hole; the permanent magnet is fixed at the lower end of the lower case; the receiving coil is sleevingly arranged to the outer side of the cylindrical magnet. *See Id.* at ¶ 12. The infringing products directly infringe claim 2 of the '542 patent. For example, the suspension body is a lamp. *See Id.* at ¶ 13. The infringing products directly infringe claim 3 of the '542 patent. For example, a transmitting circuit board is arranged inside the magnetic base of the infringing product, and the transmitting circuit board is arranged correspondingly to the transmitting coil. *See Id.* at ¶ 14.

Finally, the infringing products directly infringe claim 8 of the '542 patent. For example, they are magnetic suspension devices including a magnetic base and a suspension body; the suspension body being suspended above the magnetic base, the suspension body being provided

with a receiving coil and at least one luminous body; the magnetic base being provided with a transmitting coil, the transmitting coil transmitting an AC signal to the receiving coil; the receiving coil converting the AC signal transmitted by the transmitting coil into electric energy and supplying the electric energy to the luminous body for emitting light, wherein a transmitting circuit board is arranged inside the magnetic base, and the transmitting circuit board is arranged correspondingly to the transmitting coil, wherein an annular ferrite is arranged inside the magnetic base; a plurality of suspension system coils, a plurality of magnetic heads embedded in the suspension system coils, and a magnetic suspension circuit board are arranged inside the magnetic base; the magnetic suspension circuit board is used to control the change of the magnetism of the suspension system coils and the magnetic heads; besides, a system sensor used to control the suspension of the suspension body, and a central sensor used to control the work of the system sensor are also arranged inside the magnetic base, wherein the side of the magnetic base is provided with a through hole, and a power converter is arranged at the through hole; the power converter is used for connecting with an external power supply to provide electricity to the magnetic suspension circuit board and the transmitting circuit board, wherein the magnetic base is cuboid, the lower opening of the magnetic base is provided with a base plate; a bracket is arranged in the magnetic base; the bracket comprises an upper mounting plate, a lower mounting plate, several connecting plates connecting the upper mounting plate and the lower mounting plate, and a mounting pillar connecting the middle parts of the upper mounting plate and the lower mounting plate; the middle of the mounting pillar is provided with a containing hole; the magnetic suspension circuit board and the transmitting circuit board are arranged on the base plate, and are separately located at the two sides of the bracket; the ferrite is arranged to the outer side of the connecting plates by socket joint; the system sensor is contained in the containing hole, and the central sensor

is arranged at the upper end of the containing hole correspondingly to the system sensor; the transmitting coil is arranged at the upper end face of the upper mounting plate.

The aforementioned claims give rise to valid claims for patent infringement and warranted the entry of a TRO and preliminary injunction. The errors by Plaintiffs' counsel did not affect the overall validity of Plaintiffs' claims, nor did it affect Defendants infringement. The Seventh Circuit requires that a district judge "reflect seriously, and consider fully, before imposing or denying sanctions." *Smart Options, LLC v. Jump Rope, Inc.*, No. 12 C 2498, 2013 U.S. Dist. LEXIS 17743 * 8 (N.D. Ill. Feb. 11, 2013); *Malec Holdings II Ltd. v. Eng.*, 217 Fed. Appx. 527, 529 (7th Cir. 2007). Even with the errors in the TRO and preliminary injunction, both orders still accomplished the purpose for which they were intended, which was to freeze the accounts of the infringers and take down the listings of the infringing products. Both the TRO and preliminary injunction orders included specific links to the infringing products and listings for each Defendant, which allowed the third-party internet providers to identify the infringement.

Furthermore, upon freezing the accounts, the third-party internet providers contacted each Defendant affected by the TRO indicating that their store had been shut down from a US District Court Order, identified the case number, and provided Plaintiffs' counsels' contact email, attorney@bkchicagolaw.com, for Defendants to contact them directly. This gave Defendants actual and immediate notice of the proceedings in this case and afforded them an opportunity to appear and contest any of the orders entered by this Court. For these reasons, Plaintiffs' contend that their claims should not be dismissed as a sanction for these errors.

2. Failing to issue a summons and properly serve Defendants despite the belief that such service had been effectuated:

Plaintiffs' counsels' failure to issue a summons and to properly serve Defendants was the result of a perfect storm of events that led those counsels to the mistaken belief that service had

been proper. On August 1, 2022, Plaintiffs' counsel gathered a packet of documents to send to Defendants, including copies of the Sealed Amended Complaint, Schedule A, Sealed Temporary Restraining Order, the motion for preliminary injunction, and a notice of the preliminary injunction motion. *See Exhibit A.* As part of that packet, an unissued and incomplete summons was inadvertently and mistakenly included. *Id.* At the time of its inclusion as part of the service packet, Plaintiffs' counsel did not realize that the summons was incomplete and did not realize that it had not been properly issued. *Id.* On August 2, 2022, that packet of documents, including the Sealed Amended Complaint, Schedule A, and the unissued and incomplete summons was emailed to Defendants. *See Service Emails attached hereto as Group Exhibit B.*

Immediately prior to the service emails in this case, from July 5, 2022, to July 21, 2022, Plaintiffs' counsel Nazarian was engaged in a medical malpractice trial in the matter of *Riggins v. Morris*, Cook County Case No. 17 L 5168. *See Exhibit A.* After this trial had concluded, he was inundated with various matters due to the length of the trial, including but not limited to the review and drafting of a response to a motion for summary judgment in the matter of *James M'Lady 2021 Living Trust v. Lora Myers*, et al. Lake County Case No. 2021 CH 000358, due July 29, 2022, and the preparation for oral argument before the Second District Appellate Court in the matter of *Westberg v. Barcroft*, Second Dist. Appeal No. 2-21-0543 on August 3, 2022. At that same time, Plaintiffs' counsels' docketing clerk who typically prepares, issues, and serves summons in the firm's cases was suffering from some health issues and the death of a close personal friend on July 26, 2022. *See Declaration of Bonnie Luttrell attached hereto as Exhibit C.* As a result of these circumstances, she did not send the summons to the Clerk of the Court for issuance. *See Exhibit C.* These circumstances also led Plaintiffs' counsel to compile the service packet documents

without Ms. Luttrell's input. As a result of the aforementioned events, an unissued and incomplete summons was sent to Defendants on August 2, 2022.

In spite of this error and oversight, Defendants were still made fully aware of the claims in this case, were afforded ample time to appear and answer, and no default judgment was ever entered against them. In this case, Defendants had actual notice of all claims raised against them once the TRO was entered and the third-party internet providers acted to freeze the accounts. From May of 2022 to February of 2023, numerous Defendants, either individually or through counsel, contacted Plaintiffs' attorneys indicating that they had received notice of the lawsuit. *See, generally*, Court Docket for 22-cv-2024 indicating over 200 dismissed defendants. At the time the default motion was presented, only 134 Defendants remained in this case who had not appeared or otherwise settled. Before any default was entered, those Defendants were given actual notice of the case by operation of the TRO and Preliminary Injunction, the service email of August 2, 2022, and the notice of the default motion on December 13, 2022. *See* Group Exhibit B, and Default Service emails attached hereto as Group Exhibit D. Defendants had ample time to contact Plaintiffs' counsels, appear in Court, retain counsel, and answer or otherwise plead to Plaintiffs' Complaint.

Despite being fully aware of the case, 133 of those Defendant infringers failed to appear, answer, or otherwise plead to Plaintiffs' complaint.¹ While Plaintiffs acknowledge that without a proper summons, there is no requirement for such an answer, the fact remains that those remaining Defendants did not appear or avail themselves of the Court's protections during the pendency of

¹ The JoyBuy Defendants have been in constant communication with Plaintiffs' counsels, were not included in the Preliminary Injunction, nor the default. Following discussions between the attorneys, JoyBuy has been and is being treated as a third-party internet provider, rather than a Defendant, which is why they were excluded from the aforementioned motions. Similarly, once Defendant Meowsomerandoms appeared through counsel, they were also excluded from any default motion.

this case. “A district court may not exercise personal jurisdiction over a defendant unless the defendant has been properly served with process.” *United States v. Ligas*, 549 F.3d 497, 500 (7th Cir. 2008). However, “if a defendant does not object to the manner in which he was served in his answer or his first motion to the court (whichever occurs first), he waives the objection.” *United States v. Ligas*, 549 F.3d at 501 (7th Cir. 2008). In the matter of *Attorney Registration & Disciplinary Com. of Supreme Court v. Betts*, the Bankruptcy Court reviewed a case where an incomplete summons was issued to the defendant. 142 B.R. 819, 825 (Bankr. N.D. Ill. 1992). A proper summons was issued and served once the error had been noticed, but the defendant persisted in his objections to that service. *Attorney Registration & Disciplinary Com. of Supreme Court v. Betts*, 142 B.R. at 822-823. “Failure to provide simultaneous service of the summons and complaint is not fatal in every instance, rather Bankruptcy Rule 7004(f) provides that if a summons is not timely delivered or mailed, another may be issued, suggesting that lack of simultaneous service is not de facto fatal to jurisdiction.” *Betts*, 142 B.R. at 825. Though this applies to the Bankruptcy rules, under Rule 4 the Court may similarly allow for amendments to summons and extensions of time to serve the defendants. *See* F.R.C.P. Rule 4(a)(2) and Rule 4(m). In the instant case, once the Court notified Plaintiffs’ counsels that a summons had not been issued, Plaintiffs’ counsel acknowledge the need to vacate the default and requested time to properly serve Defendants. During the hearing on February 17, 2023, Plaintiffs’ counsel agreed that the default should be vacated, apologized to the Court, acknowledged that service was improper, that errors occurred, and requested time to correct these infractions and properly serve Defendants.

Given that Defendants have had actual knowledge of this case since its inception, and no default judgment was ever entered, and the grounds for the TRO and preliminary injunction were sound, there has been no real prejudice to Defendants. They have had every opportunity to appear

and respond to this case. They have been afforded the ability on multiple occasions to appear remotely through telephonic appearances, but, with the exception of the Defendants referenced above, they have chosen not to make any such appearance. As stated above, the bases for the preliminary injunction and TRO were sound. Plaintiffs have demonstrated that they have a valid patent and that the Defendants are infringing upon that patent through various, unauthorized internet stores. *See, generally*, Plaintiffs' Amended Complaint (Dkt. #4), Motion for Temporary Restraining Order (Dkt. #3), Motion for Preliminary Injunction (Dkt #22).

“Rule 11(b) requires an attorney to certify, to the best of her knowledge, that any pleading that the attorney presents to the court is not being presented for any improper purpose — such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation — and that the legal contentions asserted in the pleading are non-frivolous and have or are likely to have evidentiary support.” *Cartwright v. Cooney*, 788 F. Supp. 2d 744, 755 (N.D. Ill. 2011). “The central goal of Rule 11 is to deter abusive litigation practices. *Cartwright v. Cooney*, 788 F. Supp. 2d at 755 (quoting, *Corley v. Rosewood Care Center, Inc. of Peoria*, 388 F.3d 990 (7th Cir. 2004) (internal quotation marks and citations omitted)). “Rule 11 thus serves to protect courts and parties against callous disregard for governing law or the procedures of the court.” *Cartwright v. Cooney*, 788 F. Supp. 2d at 755 (quoting, *Allison v. Dugan*, 951 F.2d 828, 834 (7th Cir. 1992)) (internal quotation marks and citations omitted). In this case, there was no callous disregard for the law or the procedures of the Court. Rather, these errors resulted from a confluence of unexpected events that occupied Plaintiffs’ counsels’ and Plaintiffs’ counsels’ support staff attention to the detriment of this case. None of the errors identified by the Court were made with any intent to deceive.

Rule 11(c)(2) contemplates that a party be afforded 21 Days in which to withdraw or correct any alleged violation of Rule 11 in a pleading or other paper. USCS Fed Rules Civ Proc

R 11(c)(2). As referenced above, Plaintiffs' counsels acknowledged the mistakes made during the pendency of this case, and have requested to rectify those errors.

Under Federal Rule of Civil Procedure 4(m), “[i]f a defendant is not served within 90 days after the complaint is filed, the court—on motion or on its own after notice to the plaintiff—must dismiss the action without prejudice against that defendant or order that service be made within a specified time.” USCS Fed Rules Civ Proc. R. 4(m). Despite the mistakes made by counsels for Plaintiffs, Plaintiffs' causes of action against the remaining Defendants are meritorious, and thus Plaintiffs' request that this Honorable Court to either dismiss the case without prejudice pursuant to Rule 4(m) or provide Plaintiffs an opportunity to properly serve the Defendants in this case.

3. Failing to file proof that they deposited a bond with the Court as ordered in the temporary restraining order:

Since the entry of the Court's order on February 22, 2023, Plaintiffs' counsels reviewed the file to determine what had transpired regarding the bond and discovered that there had been a miscommunication between the counsels handling the case. Mr. Nazarian believed that Mr. Karamanis had effectuated the deposit the bond, and similarly Mr. Karamanis believed Mr. Nazarian had effectuated the deposit of the bond. In order to rectify this error highlighted by the Court, Plaintiffs have prepared a bond and will deposit the same with the Court provided they would be allowed to do so in spite of the stay on the case. To date, no claims have been made against the bond, and no Defendants have filed any counterclaims or motions for damages resulting from the operation of this case. There has been no prejudice to any Defendants resulting from the bond not being place, and Plaintiffs are prepared to post said bond if the Court allows.

CONCLUSION

For the foregoing reasons, Plaintiffs, Xiaobing Wang and Liangqing Li, by and through their attorneys, respectfully request that the Court not dismiss Plaintiffs' claims as a sanction, that Plaintiffs be afforded time to properly serve Defendants and post the bond, or for any dismissal to be pursuant to Rule 4(m) without prejudice.

Respectfully submitted,

/s/ Kenneth A. Nazarian

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ATTORNEY FOR PLAINTIFFS

EXHIBIT A

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XIAOBING WANG AND LIANGQING
LI,

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v.

INDIVIDUALS, PARTNERSHIPS, AND
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ON SCHDULE "A",

Defendants.

Case No. 22 cv 2024

District Judge Thomas M. Durkin
Magistrate Judge Sheila M. Finnegan

DECLARATION OF KENNETH NAZARIAN

I, Kenneth Nazarian, being first duly sworn upon oath in accordance with law, depose and state that I am over the age of 18 and not a party to this litigation, and if called upon to testify, I would state as follows:

1. I am one of the attorneys responsible for handling the day-to-day activities in the present case.

2. As part of my duties on this case, I was tasked with reviewing and editing submissions, attending court appearances, and communicating with Defendants/Defendants' counsels as needed.

3. On August 1, 2022, I put together a service packet of documents, including the Amended Complaint with Schedule A attached, Sealed TRO, Motion for Preliminary Injunction, Memorandum in Support of Preliminary Injunction, Notice of Motion, the Official Patent Document, a summons to be served on Defendants, and a list of emails for Defendants.

4. I did not realize that the included summons was incomplete and had not been properly issued.

5. These service emails were sent out on August 2, 2022, to the Defendants with all of the aforementioned documents attached.

6. Having believed that service had been effectuated upon Defendants through the service emails sent on August 2, 2022, I did not realize that the summons was improper until February 16, 2023, when the issue was raised by the Court.

7. On August 4, 2022, I made edits to this Court's proposed preliminary injunction order, and inadvertently failed to change the word "trademarks" to "patents." I did not realize

this error until it was identified by the Court on February 10, 2023.

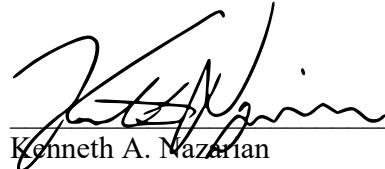
8. Immediately prior to the service emails in this case, from July 5, 2022, to July 21, 2022, I was engaged in a medical malpractice trial in the matter of *Riggins v. Morris*, Cook County Case No. 17 L 5168. After this trial had concluded, I was inundated with various matters due to the length of the trial, including but not limited to the drafting of a response to a motion for summary judgment in the matter of *James M'Lady 2021 Living Trust v. Lora Myers, et al.* Lake County Case No. 2021 CH 000358, due July 29, 2022, and the preparation for oral argument before the Second District Appellate Court in the matter of *Westberg v. Barcroft*, Second Dist. Appeal No. 2-21-0543 on August 3, 2022.

9. Immediately following this time period, I was in the midst of preparation for the depositions of the principal defendants in the matter of *Taffeta Home, LLC, v. Shenzhen Juerui Industrial, Co., Ltd.*, Case No. 21-cv-00282, on August 16, 2022, and August 17, 2022, and tested positive for COVID-19 on August 16, 2022. Following those depositions, I was sick and out of the office until August 29, 2022. Additionally, on August 10, 2022, one of Plaintiffs' counsels' associates gave her two-weeks' notice, and I was responsible for taking over the majority of her caseload until another person was hired in October of 2022. On November 12, 2022, I got married and was again out of the office on my honeymoon from November 14, 2022, to November 29, 2022.

10. On December 5, 2022, my grandfather passed away, and his wake and funeral were held on December 15, 2022. While reviewing the motion for default on December 12, 2022, admittedly distracted by the death of my grandfather, I checked the service emails to confirm that the emails had been sent and confirmed the date of those emails as August 2, 2022; however, I did not review the attachments.

Under penalties as provided by law pursuant to 218 U.S.C. §1746(2), the undersigned certifies that the statements set forth in the foregoing instrument, are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

FURTHER DECLARANT SAYETH NAUGHT.



Kenneth A. Nazarian

EXHIBIT B

Xiaobing Wang and Liangqing Li v. Individuals et al., Case No.22-cv-2024 - Motion for Preliminary Injunction and Service of Summons

attorney bkchicagolaw.com <attorney@bkchicagolaw.com>

Tue 8/2/2022 1:21 PM

To: attorney bkchicagolaw.com <attorney@bkchicagolaw.com>
Bcc: chuheart@outlook.com <chuheart@outlook.com>;kotsu-jp@outlook.com <kotsu-jp@outlook.com>;xiacheng2021@163.com <xiacheng2021@163.com>;xiacheng2021@163.com <xiacheng2021@163.com>;chun2018163@163.com <chun2018163@163.com>;danielqwer157@163.com <danielqwer157@163.com>;3152929898@qq.com <3152929898@qq.com>;3152929898@qq.com <3152929898@qq.com>;chenjia123522@163.com <chenjia123522@163.com>;183754346@qq.com <183754346@qq.com>;183754346@qq.com <183754346@qq.com>;rosemina9696@gmail.com <rosemina9696@gmail.com>;vincenthuang@ruiqintech.com <vincenthuang@ruiqintech.com>;vincenthuang@ruiqintech.com <vincenthuang@ruiqintech.com>;vincenthuang@ruiqintech.com <vincenthuang@ruiqintech.com>;pavinee.los1990@gmail.com <pavinee.los1990@gmail.com>;nblgoqnc63@163.com <nblgoqnc63@163.com>;2146327386@qq.com <2146327386@qq.com>;7988896@qq.com <7988896@qq.com>;dioqu@outlook.com <dioqu@outlook.com>;lydh74@163.com <lydh74@163.com>;ocve53@163.com <ocve53@163.com>;flowercloud990@163.com <flowercloud990@163.com>;gohappyapr@naver.com <gohappyapr@naver.com>;17134343961@163.com <17134343961@163.com>;midi44024@163.com <midi44024@163.com>;glbyzhraozpzb@hotmai.com <glbyzhraozpzb@hotmai.com>;yahse@outlook.com <yahse@outlook.com>;zongfei4673@163.com <zongfei4673@163.com>;2332514508@qq.com <2332514508@qq.com>;ll15673103349@163.com <ll15673103349@163.com>;zimi424@163.com <zimi424@163.com>;wishluo666@163.com <wishluo666@163.com>;sales@future-commerce.co <sales@future-commerce.co>;elif@unbeatablesale.com <elif@unbeatablesale.com>;teamwintrade@163.com <teamwintrade@163.com>;guozuoping@163.com <guozuoping@163.com>;13711215985@163.com <13711215985@163.com>;kokoyeswh@gmail.com <kokoyeswh@gmail.com>;2805437224@qq.com <2805437224@qq.com>;aundreamassariwf98@gmail.com <aundreamassariwf98@gmail.com>;jutobcar39@163.com <jutobcar39@163.com>;fffffishlover@163.com <fffffishlover@163.com>;286483798@qq.com <286483798@qq.com>;fourventuresusa@gmail.com <fourventuresusa@gmail.com>;cangzaidengkencvd@163.com <cangzaidengkencvd@163.com>;zgxw19@163.com <zgxw19@163.com>;zt425977670@163.com <zt425977670@163.com>;1489047586@qq.com <1489047586@qq.com>;1991775261@qq.com <1991775261@qq.com>;liyuwish2021@163.com <liyuwish2021@163.com>;460193916@qq.com <460193916@qq.com>;1509737011@qq.com <1509737011@qq.com>;ola571@gmail.com <ola571@gmail.com>;christine@sinovendors.com <christine@sinovendors.com>;smalldecor@163.com <smalldecor@163.com>;janet <janet@topsealand.com>;kinglev-us@outlook.com <kinglev-us@outlook.com>;togreenlife2012@gmail.com <togreenlife2012@gmail.com>;kinglev-us@outlook.com <kinglev-us@outlook.com>;negocioacia2018@outlook.com <negocioacia2018@outlook.com>;shenyanggaoming@outlook.com

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<sean@myavenuea.com>

ATTENTION: Any and all Defendants operating the internet stores listed in Schedule "A" to the Complaint attached below are hereby advised:

Plaintiff has charged each of the Defendants listed in the Schedule "A's" with violations of United States federal and state laws prohibiting trademark infringement, patent infringement, and counterfeiting. Judge Thomas M. Durkin in the case styled as *Xiaobing Wang and Liangqing Li v. Individuals et al.*, Case No. 22-cv-2024, pending in the Federal District Court for the Northern District of Illinois have found that Plaintiff has a likelihood of success on the merits and entered a temporary restraining order against Defendants and a preliminary injunction motion has been filed.

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Sincerely,
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Kenneth A. Nazarian
Barney & Karamanis, LLP
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Xiaobing Wang and Liangqing Li v. Individuals et al., Case No.22-cv-2024 - Motion for Preliminary Injunction and Service of Summons

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<liujuanjuan1232021@163.com>;amazingzhouxi@21cn.com
<amazingzhouxi@21cn.com>;chuheart@outlook.com <chuheart@outlook.com>

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<heartbeat2ushop@outlook.com>;ktn1115@163.com <ktn1115@163.com>;drubenbach@gmail.com
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 7 attachments (3 MB)

Summons Wang.pdf; Memorandum in Support of Preliminary Injunction.pdf; Motion for Preliminary Injunction.pdf;
Notice of Motion.pdf; Wang Li Sealed Amended complaint.pdf; Sealed TRO Wang v. Individuals 22cv2024 dkt 8.pdf;
Exhibit A-1. Official Patent Document.pdf;

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United States federal and state laws prohibiting trademark infringement, patent
infringement, and counterfeiting. Judge Thomas M. Durkin in the case styled as *Xiaobing*

Wang and Liangqing Li v. Individuals et al., Case No. 22-cv-2024, pending in the Federal District Court for the Northern District of Illinois have found that Plaintiff has a likelihood of success on the merits and entered a temporary restraining order against Defendants and a preliminary injunction motion has been filed.

A copy of the Complaint, your Summons, the Preliminary Injunction Motion, the notice of that motion for August 4, 2022, the original Temporary Restraining Order, and the Schedule A identifying each Defendant store are attached to this email. Please contact Plaintiff's attorney, Barney & Karamanis, LLP at attorney@bkchicagolaw.com or Ph#: (312) 553-5300 for more information.

Any answer or other response to the Complaint should be filed with the Clerk of the Court, United States District Court for the Northern District of Illinois, Eastern Division, Chicago, Illinois within twenty-one (21) days from August 1, 2022. If no appearance or pleading is filed, the Court may enter default judgments against the Defendants.

IF YOU HAVE ALREADY SETTLED THIS MATTER WITH PLAINTIFF AND BEEN DISMISSED PURSUANT TO A SETTLEMENT AGREEMENT, YOU MAY DISREGARD THIS EMAIL.

Sincerely,
James A. Karamanis
Kenneth A. Nazarian
Barney & Karamanis, LLP
180 N. Stetson Ave. Suite 3050
Chicago, Illinois 60601
Ph: (312) 553-5300
attorney@bkchicagolaw.com

Sincerely,
James A. Karamanis
Kenneth A. Nazarian
Barney & Karamanis, LLP
180 N. Stetson Ave. Suite 3050
Chicago, Illinois 60601
attorney@bkchicagolaw.com

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Xiaobing Wang and Liangqing Li v. Individuals et al., Case No.22-cv-2024 - Motion for Preliminary Injunction and Service of Summons

attorney bkchicagolaw.com <attorney@bkchicagolaw.com>

Tue 8/2/2022 1:21 PM

To: attorney bkchicagolaw.com <attorney@bkchicagolaw.com>
Bcc: caroline@myavenuea.com <caroline@myavenuea.com>;kokoin@outlook.com
<kokoin@outlook.com>;vgazer_us1@sina.com <vgazer_us1@sina.com>;andrew0710@163.com
<andrew0710@163.com>;vgazer_service@sina.com
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<zlimin495@gmail.com>;angelinawu2020@gmail.com
<angelinawu2020@gmail.com>;keyleeee123@gmail.com <keyleeee123@gmail.com>

ATTENTION: Any and all Defendants operating the internet stores listed in Schedule "A" to the Complaint attached below are hereby advised:

Plaintiff has charged each of the Defendants listed in the Schedule "A's" with violations of United States federal and state laws prohibiting trademark infringement, patent infringement, and counterfeiting. Judge Thomas M. Durkin in the case styled as *Xiaobing Wang and Liangqing Li v. Individuals et al.*, Case No. 22-cv-2024, pending in the Federal District Court for the Northern District of Illinois have found that Plaintiff has a likelihood of success on the merits and entered a temporary restraining order against Defendants and a preliminary injunction motion has been filed.

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EXHIBIT C

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

XIAOBING WANG AND LIANGQING
LI,

Plaintiff,

v.

INDIVIDUALS, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
ON SCHDULE "A",

Defendants.

Case No. 22 cv 2024

District Judge Thomas M. Durkin
Magistrate Judge Sheila M. Finnegan

DECLARATION OF BONNIE LUTTRELL

I, Bonnie Luttrell, being first duly sworn upon oath in accordance with law, depose and state that I am over the age of 18 and not a party to this litigation, and if called upon to testify, I would state as follows:

1. I am the administrative assistant for Mr. Karamanis and Mr. Nazarian.

2. As part of my job duties, I am the person who prepares, issues, and reviews summons for the purpose of service of process.

3. Mr. Karamanis and Mr. Nazarian rely upon my diligence in effectuating service of process in all cases.

4. In this particular case, I did not review the summons before it was sent out to Defendants and did not check that it had been properly issued.

5. On or about July 26, 2022, a close personal friend, whom I was taking care of in hospice on a daily basis, passed away without any family, which affected my concentration and attention on cases.

6. During this period of time, I was also suffering with some health issues, which generally affected my work for the months of July and August of 2022.

7. On August 1, 2022, I was preparing for a docketing meeting where I am responsible for maintaining the firm calendar and ensuring all orders have been properly docketed.

8. Due to these circumstances, I did not review the summons in this case prior to it being sent to Defendants and did not check to see that it had been properly issued.



Under penalties as provided by law pursuant to 218 U.S.C. §1746(2), the undersigned certifies that the statements set forth in the foregoing instrument, are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verify believes the same to be true.

FURTHER AFFIANT SAYETH NAUGHT.



Bonnie Luttrell

EXHIBIT D

Xiaobing Wang and Liangqing Li v. Individuals et al., Case No.22-cv-2024 - Motion for Default

Barney & Karamanis, LLP <attorney@bkchicagolaw.com>

Mon 12/12/2022 4:35 PM

To: attorney bkchicagolaw.com <attorney@bkchicagolaw.com>
Bcc: acikbassila@gmail.com <acikbassila@gmail.com>;2020august@gmx.de
<2020august@gmx.de>;2020freetrade@gmx.de
<2020freetrade@gmx.de>;liuo62492fpssz@126.com
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2018@outlook.com <businessforum-2018@outlook.com>;chenfengpolang20@126.com
<chenfengpolang20@126.com>;manimanihong1986@outlook.com

<manimanihong1986@outlook.com>;zsraswu133@163.com
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<ht41f2r@163.com>;szwupengyi111@163.com <szwupengyi111@163.com>;betty Aaronson
<onlybetty60@gmail.com>;d113457452@outlook.com
<d113457452@outlook.com>;demaikeji2021@126.com
<demaikeji2021@126.com>;demaikeji2020@126.com <demaikeji2020@126.com>

ATTENTION: Any and all Defendants operating the internet stores listed in Schedule "A" to the Motion for Default attached below are hereby advised:

Plaintiff has charged each of the Defendants listed in the Schedule "A's" with violations of United States federal and state laws prohibiting trademark infringement, patent infringement, and counterfeiting. Judge Thomas M. Durkin in the case styled as *Xiaobing Wang and Liangqing Li v. Individuals et al.*, Case No. 22-cv-2024, pending in the Federal District Court for the Northern District of Illinois have found that Plaintiff has a likelihood of success on the merits and entered a preliminary injunction.

A copy of the Motion for Default, Memorandum in Support, Declaration of James Karamanis, and Schedule A are attached, along with the notice of that motion for December 16, 2022, at 9:15 a.m. CT, via telephonic conference call at Phone#: 877-402-9757, Access Code 4410831.

If you fail to respond and file an answer to Plaintiff's Complaint served on you on August 2, 2022, the Court is likely to enter default judgments against you.

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Sincerely,
James A. Karamanis
Kenneth A. Nazarian
Barney & Karamanis, LLP
180 N. Stetson Ave. Suite 3050
Chicago, Illinois 60601

james@bkchicagolaw.com
ken@bkchicagolaw.com
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Xiaobing Wang and Liangqing Li v. Individuals et al., Case No.22-cv-2024 - Motion for Default

Barney & Karamanis, LLP <attorney@bkchicagolaw.com>

Mon 12/12/2022 4:35 PM

To: attorney bkchicagolaw.com <attorney@bkchicagolaw.com>
Bcc: lifaxing810@yeah.net <lifaxing810@yeah.net>;lifaxing850@yeah.net
<lifaxing850@yeah.net>;lifaxing825@yeah.net <lifaxing825@yeah.net>;nxxiuse2020@126.com
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<lifaxing828@yeah.net>;pelegkas1010@gmail.com
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<universaldeal@outlook.com>;lifaxing832@yeah.net <lifaxing832@yeah.net>;ktn1110@163.com
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<lailiyade02@163.com>;ralewei001@163.com <ralewei001@163.com>;djusgarden@126.com
<djusgarden@126.com>;shamerePoetter@hotmail.com <shamerePoetter@hotmail.com>

 5 attachments (613 KB)

Wang Motion for Default.pdf; Wang Memorandum in Support of Motion for Default.pdf; Wang Declaration of James Karamanis Default.pdf; Wang Schedule A for Default.pdf; Notice for Default - Wang.pdf;

ATTENTION: Any and all Defendants operating the internet stores listed in Schedule "A" to the Motion for Default attached below are hereby advised:

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Xiaobing Wang and Liangqing Li v. Individuals et al., Case No.22-cv-2024 - Motion for Default

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<lynnshop@gmx.de>;vinogradov.a.v@bk.ru <vinogradov.a.v@bk.ru>;zsraswu122@163.com
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Wang Motion for Default.pdf; Wang Memorandum in Support of Motion for Default.pdf; Wang Declaration of James Karamanis Default.pdf; Wang Schedule A for Default.pdf; Notice for Default - Wang.pdf;

ATTENTION: Any and all Defendants operating the internet stores listed in Schedule "A" to the Motion for Default attached below are hereby advised:

Plaintiff has charged each of the Defendants listed in the Schedule "A's" with violations of United States federal and state laws prohibiting trademark infringement, patent infringement, and counterfeiting. Judge Thomas M. Durkin in the case styled as *Xiaobing Wang and Liangqing Li v. Individuals et al.*, Case No. 22-cv-2024, pending in the Federal District Court for the Northern District of Illinois have found that Plaintiff has a likelihood of success on the merits and entered a preliminary injunction.

A copy of the Motion for Default, Memorandum in Support, Declaration of James Karamanis, and Schedule A are attached, along with the notice of that motion for December 16, 2022, at 9:15 a.m. CT, via telephonic conference call at Phone#: 877-402-9757, Access Code 4410831.

If you fail to respond and file an answer to Plaintiff's Complaint served on you on August 2, 2022, the Court is likely to enter default judgments against you.

IF YOU HAVE ALREADY SETTLED THIS MATTER WITH PLAINTIFF AND BEEN DISMISSED PURSUANT TO A SETTLEMENT AGREEMENT, YOU MAY DISREGARD THIS EMAIL.

Sincerely,
James A. Karamanis
Kenneth A. Nazarian
Barney & Karamanis, LLP
180 N. Stetson Ave. Suite 3050
Chicago, Illinois 60601
james@bkchicagolaw.com
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Xiaobing Wang and Liangqing Li v. Individuals et al., Case No.22-cv-2024 - Motion for Default

Barney & Karamanis, LLP <attorney@bkchicagolaw.com>

Mon 12/12/2022 4:38 PM

To: attorney bkchicagolaw.com <attorney@bkchicagolaw.com>
Bcc: yyjsuper0813@yeah.net <yyjsuper0813@yeah.net>;superhomeshop2018@yeah.net <superhomeshop2018@yeah.net>;supermedical@126.com <supermedical@126.com>;furushanyue@126.com <furushanyue@126.com>;tranlarua@outlook.com <tranlarua@outlook.com>;tatbachi1@gmail.com <tatbachi1@gmail.com>;asibolbolroki@gmail.com <asibolbolroki@gmail.com>;dingliwangluo001@163.com <dingliwangluo001@163.com>;wlruian004@163.com <wlruian004@163.com>;lifaxing812@yeah.net <lifaxing812@yeah.net>;topsupplierinchn@outlook.com <topsupplierinchn@outlook.com>;2012toptoptop@gmail.com <2012toptoptop@gmail.com>;upekhamz@gmail.com <upekhamz@gmail.com>;moranmaoramdi@gmail.com <moranmaoramdi@gmail.com>;szxynuma33@163.com <szxynuma33@163.com>;elifelibapp@gmail.com <elifelibapp@gmail.com>;heatherberyl@126.com <heatherberyl@126.com>;vvipstore2019@outlook.com <vvipstore2019@outlook.com>;1602314782@qq.com <1602314782@qq.com>;ralewei002@163.com <ralewei002@163.com>;wupengyi22@163.com <wupengyi22@163.com>;leomoranaba@gmail.com <leomoranaba@gmail.com>;kangheruixin@outlook.com <kangheruixin@outlook.com>;szwupengyi11@163.com <szwupengyi11@163.com>;chengdukang03@163.com <chengdukang03@163.com>;ludeesha1829@gmail.com <ludeesha1829@gmail.com>;yafashor.store@gmail.com <yafashor.store@gmail.com>;yinxinstore2020@outlook.com <yinxinstore2020@outlook.com>;yiyibushe010310@163.com <yiyibushe010310@163.com>;yiyibushe0020310@163.com <yiyibushe0020310@163.com>;yiyibushe0050310@163.com <yiyibushe0050310@163.com>;yiyibushe0070310@163.com <yiyibushe0070310@163.com>;lifaxing806@yeah.net <lifaxing806@yeah.net>;you359690371@126.com <you359690371@126.com>;yujuanwangluo02@163.com <yujuanwangluo02@163.com>;yujuanwangluo@163.com <yujuanwangluo@163.com>;lifaxing821@yeah.net <lifaxing821@yeah.net>;aclassgreatmalls01@163.com <aclassgreatmalls01@163.com>;aclassgreatmalls04@163.com <aclassgreatmalls04@163.com>;yyt1086@outlook.com <yyt1086@outlook.com>;russo2020gavriel@gmail.com <russo2020gavriel@gmail.com>;zhaodengzong@126.com <zhaodengzong@126.com>;yibushe01@163.com <yibushe01@163.com>;yibushe06@163.com <yibushe06@163.com>;talipayp@gmail.com <talipayp@gmail.com>

 5 attachments (613 KB)

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